

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

BIG LOTS, INC., *et al.*,¹

Debtors.

Chapter 11

Case Nos. 24-11967 (JKS), *et seq.*
(Jointly Administered)

**CERTAIN LANDLORDS' RESERVATION OF RIGHTS WITH
RESPECT TO MOTION OF DEBTORS FOR ENTRY OF AN ORDER
(I) SETTING A BAR DATE FOR FILING PROOFS OF CLAIMS FOR
PRE-CLOSING ADMINISTRATIVE EXPENSE CLAIMS AGAINST THE
DEBTORS, (II) ESTABLISHING PRE-CLOSING ADMINISTRATIVE
EXPENSE CLAIMS PROCEDURES, AND (III) GRANTING
RELATED RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

Cicero 8148 LLC, Diba Real Estate Investments, LLC, Dorchester Realty LLC, and Carson Southgate, LLC (collectively, “Claimants”), by their undersigned counsel, hereby files this reservation of rights with respect to the Motion Of Debtors For Entry Of An Order (I) Setting A Bar Date For Filing Proofs Of Claims For Pre-Closing Administrative Expense Claims Against The Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, And (III)

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Granting Related Relief, Including Notice And Filing Procedures (Docket No. 1962) (the “Motion”), and in support hereof states as follows:

1. On September 9, 2024 (the “Petition Date”), each of the above-captioned debtors (including the Debtor, the “Debtors”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. Each of the Claimants has asserted, or intends to assert, administrative claims in these cases, including but not limited to administrative claims arising on or before January 3, 2025.

3. Claimants join in all of the objections and responses filed in opposition to the relief requested in the Motion and reserves the right to argue them at the hearing on the Motion.

Dated: February 20, 2025
Wilmington, Delaware

Respectfully submitted,
HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

Attorney for Claimants